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Attorneys for Defendant
Hartford Life and Accident Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALEXANDER PAMINTUAN,

Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, as Claims
Administrator of the Life Care Centers of
America, Inc. Welfare Benefits Plan; DOES I
through V; and ROE CORPORATIONS I
thru V inclusive,

Defendants.

Case No. 2:21-cv-01365-RFB-NJK

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO FILE
DISCOVERY PLAN/SCHEDULING
ORDER**

[First Request]

The parties, Plaintiff Alexander Pamintuan (“Plaintiff”), through his counsel, Julie A. Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident Insurance Company (“Hartford”), through its counsel, Michael B. Bernacchi of Burke, Williams & Sorensen, LLP, hereby respectfully submit this Stipulation, Request and Order to Extend Time to file the Discovery Plan/Scheduling Order (the “Stipulation”). This Stipulation is made in

1 accordance with Local Rules IA 6-1, IA 6-2, and II 7-1. This is the first request for an extension
2 of time to file the Discovery Plan/Scheduling Order.

3 1. On September 29, 2021, Defendant Hartford filed its answer to Plaintiff's
4 Complaint. [Dkt. 11] Upon the filing of Hartford's answer, the Court issued a deadline for the
5 parties to file the Discovery Plan/Scheduling Order by November 13, 2021.

6 2. The parties conducted their Rule 26 conference on October 4, 2021.

7 3. The parties are actively engaged in settlement negotiations which they hope may
8 resolve this case and wish to extend the deadline to file the Discovery Plan/Scheduling Order by
9 30 days.

10 4. This request is made in good faith and not for purposes of delay.

11 5. The parties hereby jointly request that this Court extend the time to file the
12 Discovery Plan/Scheduling Order from November 13, 2021 to **December 13, 2021** while they
13 attempt to informally resolve this case without judicial intervention.

14 DATED this 28th day of October, 2021.

15 LAW OFFICE OF JULIE A. MERSCH
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Nevada Bar No. 004695

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By: /s/ Michael B. Bernacchi

20 Attorney for Plaintiff
21 Alexander Pamintuan

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25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATED: _ October 28, 2021

BY: 
UNITED STATES MAGISTRATE JUDGE